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March 17, 2003

Ex Parte Presentation

Marlene H. Dortch, Secretary
Federal Communications Commission
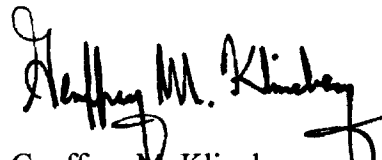445 12th Street, S.W.
Washington, D.C. 20554

> Re: *Application by SBC Communications Inc., et al. for Provision of In-Region, InterLATA Services in Michigan*, WC Docket No. 03-16

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC"), and at the request of FCC staff, I am attaching to this letter SBC's responses to a set of questions received from staff on March 13, 2003. See Attachment A. In addition, SBC would like to make a minor correction to some data that were included in Table 2 at page 10 of Attachment A to the ex parte letter submitted on March 14, 2003. For ease of reference, I am reproducing the revised table as a separate attachment to this letter. See Attachment B.

In accordance with this Commission's Public Notice, DA 03-156 (Jan. 16, 2003), SBC is filing this letter and attachments electronically through the Commission's Electronic Comment Filing System. Thank you for your kind assistance in this matter.

Sincerely,

Geoffrey M. Klineberg

Attachments

cc: John P. Stanley   Susan Pié
     Gina Spade   Layla Seirafi-Najar
     Russ Hanser   Dorothy Wideman
     Michael Engel   Ann R. Schneidewind
     Marcus Maher   Qualex International
     Denise Coca

Attachment A

SBC'S RESPONSES TO QUESTIONS FROM THE FCC STAFF

Data Issues

1. **It is our understanding that when Ernst & Young performed retesting, it examined modified computer code and in some cases flowed a subset of data – in particular, data that would have been affected by the previous error – through the revised logic to test the correction. Is that understanding correct? If so, how could Ernst & Young determine whether the correction, as implemented, had unintended consequences with respect to other data that was not mishandled by the original code?**

   Yes, that understanding is correct. Attachment G of the initial Dolan/Horst Joint Affidavit, together with the Dolan/Horst Second Joint Affidavit, provides a detailed description of the methods and procedures Ernst & Young ("E&Y") used in connection with its Corrective Action Reports.[1] For corrective actions involving modified computer code, E&Y described its examination approach with respect to code review as follows:

   > In all situations in which the Company implemented corrective action through a computer program code change, E&Y read the computer program code change in addition to performing transaction testing to determine that the design of the computer program code change addressed the corrective action, regardless of whether the computer program change was to an operational support system, to a query performed by the Company to capture and load data or to the Company's performance measurement reporting system.[2]

   The transaction testing that E&Y used to determine whether the modified computer programming changes were implemented are described in the Dolan/Horst Second Joint Affidavit as follows:

   > [T]o validate the results of the computer program code review, E&Y performed transaction testing to determine that the program code was functioning as designed. For issues pertaining to a mechanized system, E&Y obtained electronic source transaction data files for the affected PM before the Business Rules (exclusion, inclusion, calculation of numerator and denominator, and disaggregation rules) were applied (i.e., raw data). E&Y also obtained the corresponding electronic reporting or detail file for the affected PM after the Business Rules were applied. E&Y tested the correction by applying E&Y executed queries to the source data files. The results of this test were compared to the Company reporting or detail files to validate that the implemented correction was functioning correctly. For issues where the Company made a correction to include transactions in accordance with Business Rules, E&Y performed additional test procedures to test the completeness of those inclusions. E&Y selected an additional random sample of transactions that were excluded and E&Y discussed the sample of

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[1] See Dolan/Horst Joint Aff., Attach. G (App. A, Tab 8); Dolan/Horst Second Joint Aff. ¶¶ 26-36 (Reply App., Tab 7).

[2] See Dolan/Horst Second Joint Aff. ¶ 29.

transactions with the various subject matter experts within the Company to validate that these transactions were being properly excluded for the appropriate reasons specified in the Business Rules. In addition, in response to questions relating to E&Y's testing of corrective action, E&Y obtained source data files in order to test the Company's implementation of corrective action, identified transactions that were previously reported in error and then queried the reporting files to determine if those same transactions were appropriately reflected in the reporting files. For example, if the Company corrected an error where it had improperly excluded projects from the PM results, our testing would have identified all transactions identified as being part of a project within the source system and then compared those transactions to the reporting files to determine if they were now properly included.[3]

Based on this computer code review and transaction testing, E&Y determined whether the corrective action taken by Michigan Bell was effective. If it was not, E&Y advised the Michigan Bell and then the Company took additional corrective actions as needed. E&Y did not perform "regression testing," meaning an analysis on the corrective action to determine if unintended consequences with respect to other data not mishandled by the original computer program code occurred.[4] However, E&Y did perform analytical reviews of the restated results to determine the reasonableness of the revised results after implementation of the corrective actions. As stated in the Dolan/Horst Second Joint Affidavit, E&Y "did not note any instances where modifications made by the Company to address corrective action negatively impacted any other PM."[5]

Apart from the E&Y examination, SBC's IT development teams perform unit testing and other validation steps whenever a change is made to PM code. In many cases, regression analysis is also performed by reviewing results before and after the change. Additionally, validation is also performed by Long Distance Compliance and/or business process owner staff to ensure the accuracy of the changes before they are implemented.

2. **Please explain in greater detail the process by which Michigan Bell provides raw performance data to requesting carriers, and elaborate Michigan Bell's response to AT&T's arguments concerning PM 39.**

The provision of raw data to a CLEC is typically an informal "business-to-business" arrangement precipitated by the CLEC's request for raw data for certain months and certain measurements. The Performance Remedy Plan generally envisions a 20-day turn-around

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[3] Id. ¶ 30 (footnotes omitted).

[4] The methods and procedures that E&Y used in connection with its audit of the Michigan business rules were substantially similar to audits it conducted of Southwestern Bell Telephone Company's ("SWBT") performance measurement systems and processes for the Missouri Public Service Commission during its review of SWBT's Missouri Section 271 application, and for performance measurement audits that E&Y has been engaged to perform, on behalf of the Commission, in connection with the annual audit of SBC's compliance with the Carrier-to-Carrier Performance Plan contained in the SBC/Ameritech Merger Conditions for all thirteen SBC states. See Dolan/Horst Joint Aff. ¶ 5. E&Y did not perform a "regression testing" in any of these prior audits that have been relied upon by this Commission.

[5] Dolan/Horst Second Joint Aff. ¶ 36.

time for such requests pursuant to "mutually acceptable format, protocol, and transmission media." Performance Remedy Plan, Section 1.1. AT&T's discussion (AT&T Reply Comments at 46-47; Moore/Connolly/Norris Joint Reply Decl. ¶¶ 129-135) neglects to acknowledge that Michigan Bell has been providing AT&T raw data for several measurements for approximately a year. See Ehr Reply Aff. ¶ 122 (Reply App., Tab 8). Michigan Bell's reply also refuted AT&T's misleading claims regarding raw data recently provided to AT&T for PM 39 (Receipt to Clear Duration). See id. ¶¶ 121-132. Its new claims, based on raw data requests likewise made in the same week, are similarly without basis.

The process for providing raw performance data to CLECs is handled on a case-by-case basis, and generally follows the process steps listed below:

1. Request for data received, typically via email, from the CLEC by either SBC Account Management or SBC Long Distance Compliance staff (Day One).

2. Request is confirmed with CLEC – PMs, months, delivery method, etc. as appropriate (typically Day Two to Day Four, depending upon complexity of request).

3. Request is submitted internally to appropriate staff to pull the requested data and format into, typically, a Microsoft Excel file format (depending upon complexity of request, typically may take from Day Five through Day Twenty).

Michigan Bell strives to provide the data as quickly as possible given the nature and timing of the request. Michigan Bell meets the time frame envisioned by the Performance Remedy Plan in the large majority of cases. Effective with February 2003 results, in response to CLEC requests, SBC Midwest began implementation of the CLEC Raw Data Website (with the implementation of two measures). This function, similar to that provided by SBC Southwest, allows CLECs to initiate a request for their raw performance data on-line and then retrieve the resulting data file on-line. Additional PM data is scheduled to be available beginning with March 2003 results reported in April 2003, with additional PM data being added throughout 2003.

Michigan Bell provided AT&T the raw data that AT&T requested on January 17, 2003, for PM MI 13 (Percent Mechanized Line Loss Notifications Returned Within One Day of Work Completion), and Michigan Bell provided data relating to PM MI 15 (Change Management) by the end of January. Moreover, while AT&T appears dissatisfied with a turn-around time of "almost three weeks" for raw data for PM 9 (Percent Rejects), this period is within the 20 days envisioned by Michigan Bell's Performance Remedy Plan, and AT&T has not shown any prejudice in not having received the data earlier. And when AT&T identified to SBC the need for additional data not included on the initial data file for PM MI 13, Michigan Bell provided that additional data just six days later.

AT&T's related claims regarding allegedly unavailable subject matter experts ("SMEs") are without any basis. When Ms. Karen Moore of AT&T requested the presence of two named performance measurement managers to discuss PM 39, she made no request for Network

SMEs to be made available to discuss any measurement-related issues and did not request a discussion of specific issues regarding application of "no access" or "delayed maintenance" to trouble tickets or installation orders. And, while Michigan Bell's two PM managers could not be available on the requested day, AT&T agreed to Michigan Bell's proposed alternative date (thanking Michigan Bell for arranging the meeting date). Just two days before the meeting, AT&T mentioned having a discussion with "network folks." At that meeting, on February 19, 2003, AT&T for the first time mentioned discussing "no access" or "delayed maintenance." Michigan Bell suggested a separate conference call regarding the subject, and a meeting date was agreed to. However, the day before the scheduled call, AT&T notified Michigan Bell that it wanted to review December 2002 performance data, rather than data from earlier months as had been discussed earlier. Because AT&T expected Michigan Bell Network SMEs to be prepared to address the specific trouble tickets, the meeting had to be rescheduled to allow the SMEs time to review the new information. AT&T agreed to the rescheduling.

That meeting was held on Wednesday, March 12, 2003, and lasted less than ten minutes. Once Michigan Bell explained to AT&T the applicability of the 0526 disposition code, AT&T was left with no questions remaining. Had AT&T initially requested clarification as to the use of the 0526 disposition code, the answer could have been provided early on. AT&T thanked Michigan Bell for that information, and the call ended, with no review of any specific trouble tickets (the very reason that AT&T had insisted that network SMEs be made available) and no discussion of "no access" or "delayed maintenance" coding.

Michigan Bell has provided ample evidence of its good faith in working with AT&T regarding its recent data requests, including providing the requested data in a timely manner and making appropriate SMEs available to answer questions. To the extent that AT&T would desire a more formal and stratified process, the Commission should direct AT&T to raise this issue with the Michigan PSC.[6]

Pre-Ordering OSS

3. **Can Michigan Bell explain the cause of the pre-ordering interface outages cited by WorldCom and AT&T?**

SBC Midwest has already fully addressed the complaints of AT&T related to alleged "outages" during the last three months of 2002. See Cottrell/Lawson Joint Reply Aff. ¶¶ 81-84 (Reply App., Tab 5). Unlike AT&T's analysis, which utilizes an internal "impacted usage minutes" methodology to come up with an allegation that CORBA was supposedly unavailable for almost 500 user hours during the last three months of 2002, SBC Midwest's performance results – which are based on business rules available to all parties – establish that SBC Midwest's CORBA and EDI pre-ordering interfaces exceeded the relevant benchmark of 99.5% availability in every month between November 2002 and January 2003. See id. ¶¶ 82, 85.

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[6] See, e.g., BellSouth Five State Order ¶ 18 n.57.

In addition, preliminary February results for EDI (PM 4-16) and CORBA (PM 4-17) availability also exceeded the benchmark at 99.56%. During February, it appears that EDI and CORBA were not available for only 2.29 hours (out of a total 524 available hours) due to a 2-hour hardware outage and some minor middleware degraded service times. Thus, there can be no question that SBC Midwest EDI and CORBA pre-ordering interfaces are stable and provide CLECs with a meaningful opportunity to compete.

Nonetheless, AT&T has raised a claim with regard to CORBA outages. Specifically AT&T claims that it coded its side of the CORBA interface using the Interface Definition Language ("IDL") promulgated by SBC for version 5.02 of that interface and that SBC assured AT&T that (with one exception related to the CSI Summary) the published IDL for version 5.03 was identical to those for version 5.02. See AT&T's DeYoung/Willard Joint Reply Decl. ¶ 45. AT&T claims that it when it compared the two versions, however, it found numerous differences, and that these "unannounced changes" resulted in AT&T experiencing marshalling errors" that lead to "more than 18 minutes of CORBA pre-order outages for AT&T each day." Id. ¶ 48. In wrongly asserting that SBC is responsible for AT&T's outages, AT&T has distorted the facts.

First, SBC has made no changes whatsoever to its CORBA pre-order interface since the version 5.02 implementation in November 2002. Further, just as SBC represented to AT&T, the new CSI Summary functionality for version 5.03 (which was implemented on March 15, 2003) was properly announced per CMP guidelines in an Accessible Letter. See CLECALLS02-122 (Oct. 4, 2002) (App. K, Tab 17). No CLEC is required to implement the new CSI summary functionality; any CLEC continuing to operate on version 5.02 would experience no disruption or problem from the addition of the IDL change for this new functionality.

Second, the CORBA service interruptions AT&T has experienced are due entirely to coding problems and mistakes on its own side of the interface. In the course of assisting AT&T with "debugging" AT&T's side of the CORBA interface, SBC reviewed a comparison prepared by AT&T between the IDL it was using in production, and the IDL on SBC's website for the upcoming version 5.03 release. The differences between the two IDLs used by AT&T were entirely attributable to programming errors on AT&T's side of the interface. SBC has made no changes to the version 5.02 IDL since it was implemented in November 2002. No other CLECs using CORBA have reported any alleged changes in SBC's interface.

Third, given that there were no changes to SBC's programming, if AT&T's suddenly began experiencing "marshalling errors" when the interface had worked properly in the past, those errors only can have occurred because of actions taken by AT&T on its side of the interface. It is clear in this case that the problems experienced by AT&T were due solely to programming issues on its side of the interface.

In response to WorldCom's complaints of pre-order "outages," SBC has reviewed its internal IS Call Center logs, which capture CLEC reports of pre-order related issues. SBC has identified the following:

- WorldCom reported a "time-out" error on February 5, 2003.[7] Upon investigation, SBC discovered that an intermittent problem resulted in a system slow-down when a high volume of CLEC EDI ordering transactions hit SBC's firewall simultaneously. This problem may have impacted processing of WorldCom's pre-order transactions. SBC reconfigured its firewall that same day to handle a significantly higher volume of simultaneous orders. Since that time, the firewall problem has not reoccurred.

- At approximately 7:30 p.m. on February 7, 10, 11, and 12, 2003, WorldCom reported time-out errors when attempting to execute EDI pre-order transactions. When the slow response issue was first reported, it cleared in less than an hour, with no intervention from SBC or any CLECs. The same thing happened the next two days at precisely the same time. On February 12, SBC's OSS support team reviewed the system at that time and discovered that transactions being sent by one CLEC were slowing the system down. Specifically, one CLEC was populating an entry in the wrong field, which caused a pre-order EDI transaction to pull an entire CSI for each TN in question, rather than some basic information. The CLEC in question was advised concerning the proper parameters for execution of its pre-order transactions; once these adjustments were made, no additional problems were detected. WorldCom reported no additional related incidents.

- WorldCom also reported a time-out issue on February 21, 2003. Although it thoroughly investigated WorldCom's complaint, SBC did not identify any problem within its applications, servers, or firewalls. SBC requested that WorldCom investigate its internal applications and routing components to ensure that no issues on WorldCom's side were contributing to the reported time-outs. The issue was resolved with no apparent resolution steps taken by WorldCom or SBC.

4. **Please describe in further detail how Michigan Bell calculates the metrics reflecting pre-ordering interface availability in cases where the outage is limited to a discrete set of one or more competitive LECs.**

Pre-order interface availability is assessed by PM 4 (OSS Interface Availability). PM 4 reports results at a regional (five SBC Midwest states combined) level as the OSS does not differentiate between states for pre-order inquiries. Also, the OSS does not differentiate between CLECs for all interfaces except one, so the results of PM 4 are reported for all CLECs in the aggregate. PM 4 results report on interface availability to the CLEC industry as a whole, not to individual CLECs. The results include when an interface is totally unavailable to all CLECs, unavailable to certain CLECs, and when availability is degraded, but not totally unavailable.

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[7] A "time-out" occurs when a CLEC does not receive a response within the established timeframe, which may vary depending on the transaction type.

SBC's Problem Management (Availability Team) organization assesses interface availability in the following manner: An outage is defined as any condition where there is limited accessibility or complete inaccessibility to the functionality of an interface during the scheduled online hours of availability, regardless of the number of users logged on. Downtime is recorded on the applications/systems that are not functioning as designed (impaired/degraded) or completely down during the scheduled online hours of availability. The methodology for calculating downtime is not an exact science but is a collaborative effort among several SBC entities. A common challenge is determining what percentage of the application was not accessible due to the fact that one or more functions were not available. Additionally, if access to the interface is impaired, such that some users can work while others cannot login, that condition is captured by the application of an "availability factor" which accounts for degraded service.

The only OSS component which tracks specific time by CLEC for the PM 4 measurement is the ARAF. The ARAF is the connection point for the CLECs into the SBC network. However, while data is collected at the CLEC level, it is reported at the aggregate level, as are all other submeasures of PM 4. Downtime of this component that impacts only one or a few CLECs is averaged into the whole to represent the impact to the CLEC community as a whole.

An example of this type of problem occurred in February 2003 when four CLECs experienced 80 minutes each of downtime because of an ARAF problem. This time was included in the detail data for the ARAF interface. Scheduled time for the interface was 35,280 minutes for the month. These four CLECs had 35,200 minutes of availability for the month, however 201 other CLECs had 35,280 minutes available for the month. When this downtime was included in the aggregate, SBC reported 35,280 minutes scheduled with 35,278 minutes available for a 99.9% result in the aggregate.

Most of the interfaces that SBC provides to CLECs do not have components that are specifically available to only one CLEC or a group of CLECs. Therefore, partial availability is calculated based on application function rather than user base. If a specific function is degraded, even if only a few CLECs are impacted or have reported the problem, SBC would determine the impact to the entire CLEC population based on the functions of the application which are impacted. CLECs may be impacted differently based on their use of the application. An example of this type partial availability included in the measurements would be the following. On January 9, 2003, some CLECs reported errors with address qualification in the CORBA interface. This service problem began at 7:54 Central Time and ended at 9:34 Central Time for a total of 99 minutes clock time. This was the only type of transaction having a problem during this time period; all other transactions were operating normally. The problem manager and SMEs who worked on the problem determined that this impacted approximately 10% of the application transactions. A 10% impact was applied and 10 minutes downtime was taken against the CORBA application as a whole.

An additional example of partial availability that impacted some CLECs and not others but that will be reported in the interface availability for the month occurred on March 10, 2003,

in WEBLEX. Over a 4-5 hour period, SBC received reports from some CLECs that they could not login to the application, while other CLECs were in and able to do ordering. It was determined that an incorrect property file was causing some CLECs to be unable to login. This impacted approximately 5% of the CLECs. This file was corrected, and each of WEBLEX's three servers were individually bounced to correct the problem. An impact percent of 5% was applied to the outage resulting in 13 minutes of downtime to the application as a whole.

Ordering OSS

5. **Michigan Bell explains that even if it notified WorldCom of an erroneous completion notice via a line loss notifier (as WorldCom requests) rather than via an e-mail message, that notifier would still be sent manually. Please explain why this must be the case.**

   Electronic line loss notifications ("LLNs") are triggered upon completion of the service order converting the end-user from service provided by a CLEC to SBC, or to another CLEC (see response to Question No. 12 below). Because no actual line loss has occurred in the case of an erroneous completion notice, no system trigger exists to send an electronic line loss notification to the CLEC. Accordingly, SBC has no way to return an electronic LLN (or other type of electronic notice) when the CLEC has received a completion notice in error.

   As discussed in the Reply Affidavit of Justin Brown, SBC recognizes the potential impact to the CLEC of receiving an erroneous completion notice. See Brown Reply Aff. ¶ 18 (Reply App., Tab 2). Accordingly, in the rare instances where it determines that this situation has occurred, SBC provides the CLEC with notification via e-mail, including the PON number and other detail, including a brief synopsis of what led to the erroneous completion. This action correctly reflects the situation at issue, and the information provided allows the CLEC to identify the account in question; take appropriate action to prevent additional incorrect billing of the end user; to refund any incorrectly billed amounts; and to determine whether it wishes to resubmit its original order migrating the customer.

6. **In its reply, AT&T alleges that Michigan Bell's OSS have improperly rejected LSRs requesting conversion of special access circuits to UNEs. See DeYoung/Willard Reply Decl. paras. 64-66. What is Michigan Bell's response?**

   Effective March 9, 2003, SBC retired the functionality that allowed CLECs to order local loops via ASRs. When AT&T began to submit orders for special access conversions via LSR, it encountered rejects for "busy Connecting Facility Assignment (or CFA)."

   SBC Midwest's systems are designed to validate that a CFA is available for all new UNE orders. In a special access-to-UNE conversion, the CLEC reuses the active CFA. However, because the access circuit was active, the validation process read the CFA as busy, and the CLEC received a reject. In order to bypass the validation process on such conversions, SBC Midwest instructed CLECs to populate the Related Purchase Order Number ("RPON") field

(for version 4.02) and the Number Of Requests ("NOR") field (for version 5.xx). This process enables the order to be provisioned without rejecting back to the CLEC.

These instructions were posted to the CLEC OnLine website on February 25, 2003. Additionally, on March 10, 2003, SBC created a change request ("CR") to modify its programming so that special access-to-UNE conversions automatically bypass CFA validation for special access, eliminating the need for CLECs to populate the RPON/NOR fields. This CR will be prioritized and packaged in a future release.

7. **AT&T also complains that Michigan Bell has withheld BCNs while conducting an internal billing reconciliation. Why has this happened and is this continuing today?**

See Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC (Mar. 14, 2003) ("March 14 Ex Parte"), Attach. B, at 3 n.10.

8. **Why can't Michigan Bell contact a competitive LEC's end user to work out working service conflicts? Isn't Michigan Bell better suited to evaluate the status of multiple lines, particularly where the end user takes service from more than one LEC?**

As noted in the Cottrell/Lawson Joint Reply Affidavit, "SBC Midwest has no means of resolving a [working service conflict] for the CLEC, other than by making direct contact with the CLEC's end-user. It is not customary or appropriate for an SBC employee to talk directly with a CLEC end user at this point in the order process." Cottrell/Lawson Joint Reply Aff. ¶ 50. Without obtaining information provided by the end user, SBC cannot determine whether the working service at the premise is abandoned (and therefore should be disconnected), or whether the service ordered by the CLEC is intended as an additional line. This is true regardless of how many lines and/or how many LECs serve the end user – resolution of the working service conflict depends upon the manner in which the CLEC and the end-user want the service to be installed.

SBC has no authorization to contact the end-user on the CLEC's behalf in this situation. Further, even if the CLECs were to authorize SBC to make such contact, the process would be far more cumbersome and prone to delay than the process agreed to by the CLECs as part of the CLEC User Forum ("CUF"). Some of the complexities that would need to be resolved include:

- How would the end-user's contact information be provided by the CLEC to SBC.

- What parameters/processes would govern the contact between SBC and the CLEC's end user? CLECs typically have been very reluctant to have SBC directly involved in contact with their end-user customers.

- How would subsequent order processing be handled? SBC must receive authorization from the CLEC to either disconnect/replace the old service, or

> establish the new request as an additional line. SBC would need to contact the CLEC so that the CLEC could issue its new or supplemental order.

- Who would be responsible for any miscommunication (between the SBC and the CLEC's end-user; between SBC and the CLEC) that may occur in these situations?

In these circumstances, the CLEC clearly is the best situated to obtain the necessary information from its own end user, and to provide that information to SBC via the appropriate order type. Interjecting SBC between the CLEC and its end user would unnecessarily complicate the process, leading to greater chances of error and delay in provisioning service.

9. **Please provide further detail regarding the collaborative meetings' resolution of the "Project" definition issue raised by TDS Metrocom.**

In the recently concluded PM collaborative meetings, changes were proposed and agreed to regarding the application of the exclusion for projects in PM 5 (Percent Firm Order Confirmations [FOCs] Returned Within "X" Hours), PM 6 (Average Time to Return FOC), PM 9 (Percent Rejects), new PM 10 (Percent Rejects Returned Within "X" Hours, replacing PMs 10, 10.2, 10.2 and 10.3), and new PM 11 (Mean Time to Return Mechanized Rejects, replacing PMs 11, 11.1 and 11.2). The project exclusion applies to service requests involving major projects either as mutually agreed upon by CLECs and SBC Midwest or as defined on the SBC CLEC OnLine website. The Michigan PSC adopted these changes on February 20, 2003. No proposals were made or discussions held on changing the exclusion for projects in other measurements. The PM collaboratives remain available to CLECs such as TDS Metrocom who may wish to effectuate changes in the PM business rules. See Ehr Reply Aff. ¶ 155 (discussing TDS Comments at 21).

Performance Measures

10. **Michigan Bell has failed to satisfy each of the following performance measures for at least two months. Please supply Michigan Bell's arguments, if any, regarding these measures: 5-10; 5-16 (any response other than low volumes?); 5-32; 10.2-01; 10.3-01; MI 2-01; MI 2-10; MI 13-01 (especially January).**

Michigan Bell's performance for the over fifty submeasures of PM 5 (Percent Firm Order Confirmations [FOCs] Returned Within "X" Hours) has been strong. During the three-month period from November through January, Michigan Bell timely returned 97.56% of CLECs' FOCs associated with 556,085 CLEC orders. The three submeasures identified by the Commission collectively generated just 282 orders for which FOCs were returned during the three months concluding in January, i.e., just 0.05% of the 556,085 orders. For these three submeasures of PM 5, volumes were such for most months that benchmark attainment would have allowed for only one, and sometimes no, missed notification timeframes. No specific root cause for failures to meet the benchmark standards has yet been identified. Michigan Bell's LSC organization continues to monitor performance on

these and all FOC measures, and addresses process deficiencies whenever they are identified.

Greater than 90% of Michigan CLECs' manually rejected orders transmitted electronically have been returned within 5 hours in each of the three months from November 2002 – January 2003. Over these three months combined, 93.01% of CLECs' manually rejected orders received electronically have been returned within 5 hours. While these performance results did not meet the 97% benchmark for PM 10.2-01 (Percent Manual Rejects Received Electronically and Returned Within 5 Hours), over these same three months, only 85.73% of the manually rejected orders received electronically from Michigan Bell's affiliate were timely returned. Similarly, while the performance data reported for PM 10.3-01 (Percent Manual Rejects Received Manually and Returned Within 5 Hours) did not meet the 97% benchmark, the results were superior to those provided to Michigan Bell's own affiliate.

Justin W. Brown states in his initial affidavit that,

> [c]urrently, the SBC Midwest business rules that define PM 10.2, PM 10.3 and PM 5 (FOC) are in conflict with respect to the timeframe allowed to process similar orders, rather than reject similar orders. That is, PM 5 has many disaggregations for manual intervention, in which, the LSC Service Representative has 24 to 48 hours to return an FOC to the CLEC, but only has five hours to return a reject on the same order request if a reject is warranted. In many cases, the LSC Service Representative may not know that a request needs to be rejected until the order has reached the final stages of processing and well after the five hour reject benchmark has been passed. During the last 6 month review process, the CLECs agreed that this disparity needed to be addressed and did agree to major modifications to PM 10.2 and PM 10.3 in order to better align both with PM 5, thereby, assisting the LSC in better meeting the benchmarks for both.

Brown Aff. ¶ 31.

These changes have been approved by the Michigan PSC and will be implemented no later than the May 20, 2003, reporting of April results. According to analysis performed by SBC, the data for the two categories of rejects previously represented by PMs 10.2 and 10.3 (which will now be disaggregations of PM 10) show that, for the months of September 2002 through December 2002, the 95% benchmark would have been met in each month for both disaggregations. An analysis of January data has not as yet been completed.

Jeopardy notification report rates assessed in PMs MI 2-01 (Percentage of Orders Given Jeopardy Notices Within 24 Hours of the Due Date – Resale – FW) and MI 2-10 (Percentage of Orders Given Jeopardy Notices Within 24 Hours of the Due Date – UNE-P) overstate any impact to the consumer. These measures assess when the jeopardy notice was sent for those orders that received a jeopardy notice. The corresponding submeasures of PM 10.4 provide the percentage of all orders that received jeopardy notices. Results for these measures show that less than 10% of Resale Field Work orders received a jeopardy notice in each of the five months September 2002 – January 2003. For UNE-P orders, less than 1% received jeopardy notices in each of the five months September 2002 – January 2003.

PM MI 2 reports on this subset of total orders processed (those that actually received jeopardy notices) and assesses the percent of those sent on or within 24 hours of the due date. Changes to operational processes are in progress to avoid the use of jeopardy codes for non-jeopardy communications with the CLEC regarding their orders, which is degrading performance. In addition, during the recently completed PM collaborative, agreement was reached to replace the parity comparison performance standards with a 5% benchmark for all submeasures of the jeopardy notification-related measures (including PM MI 2) along with additional changes to focus the results on jeopardy notice timeliness prior to the due date. This change to a benchmark standard is important because there is no true analog process for Michigan Bell Retail, as jeopardy notices are not sent to Michigan Bell's retail customers. Future results reported under the new measure, with the appropriate operational process changes in place, are expected to approach the 5% benchmark standard agreed to in the collaborative.

With respect to PM MI 13-01, Michigan Bell inadvertently failed to update a CLEC's OSS Customer Profile to cause LLNs to be sent via LEX rather than facsimile. See March 14 Ex Parte, Attach. A, at 7 n.9. Thus, in January, Michigan Bell reflowed approximately 1,150 LLNs via LEX to the CLEC in question at its request. This caused Michigan Bell to miss PM MI 13-01 in January.

Line Loss Notifications

11. Do the business rules for the new PM MI 13 include Michigan Bell winbacks? If not, does Michigan Bell plan to rewrite the rule and resubmit it for approval, or does Michigan Bell plan to include winbacks anyway?

See March 14 Ex Parte, Attach. A, at 8-10; see also Attachment B to this letter.

12. How is a LLN triggered when Michigan Bell is the carrier winning the customer? Are all of these LLNs mechanized or are some provided to CLECs via a manual process?

LLNs are triggered upon completion of the service order converting the service from one carrier to another. When SBC Midwest receives a request from an end user to migrate from a CLEC to SBC, retail service order(s) are created. Service orders that disconnect service provided by the CLEC are populated with a unique Field Identifier ("FID") designating the order as a winback ("WNBK"). SBC Midwest's systems include edits designed to require the population of the WNBK FID on such orders.

Once the service orders complete, the WNBK FID triggers the systems to gather the appropriate information and to send an LLN to the losing CLEC. The LLN is delivered to the CLEC in whatever manner the CLEC has chosen (EDI, LEX or FAX). If a CLEC has requested electronic LLN transmission, manual LLNs are only provided in those instances when LASR or MOR is unable mechanically to generate the LLN due to a system or service order error. See Cottrell/Lawson Joint Reply Aff. ¶ 118; see also CLECAMS02-105 (Sept. 20, 2002) (App. J, Tab 32).

13. **Please explain if you have determined the proposed fix for the problem identified in the March 6, 2003, accessible letter. Also provide any additional information you may have regarding the scope of the problem.**

See March 14 Ex Parte, Attach. A, at 7; see also Accessible Letter CLECAMS03-021 (Mar. 14, 2003), attached as Exhibit 1 to this Attachment.

14. **Please explain, for the situations discussed in Cottrell/Lawson Reply Aff. at paras. 99-114, (1) the number of days for the problem to be resolved and (2) the number of days the LLNs were delayed due to the problem (i.e., when did the competitive LEC receive the LLN). The affidavit provides some of this information but the difference between (1) and (2) is not clear and it is not provided for each problem.**

Issue	Problem Began/Identified/Resolved	Resend Complete/Delay Days [8]
LLN "Missing TNs" (Cottrell/ Lawson Joint Reply Aff. ¶¶ 99-100)	Began: March 4, 2002 Identified: March 24, 2002 Resolved: March 25, 2002	Resend Complete: March 26, 2003 Delay Days: 1-22
AT&T LLNs sent to wrong location (Cottrell/Lawson Joint Reply Aff. ¶¶ 101-102)	Began: March 26, 2002 Identified: April 3, 2002 Resolved: April 4, 2002	Resend Complete: April 10, 2002 Delay Days: 6-15
Some LLNs Not Sent (Cottrell/ Lawson Joint Reply Aff. ¶¶ 103-104)	Began: August 15, 2002 Identified: Sept. 10, 2002 Resolved: Sept. 11, 2002	Resend Complete: Sept. 23, 2002 Delay Days: 6-39
LLNs Missing Conversion Dates (Cottrell/Lawson Joint Reply Aff. ¶¶ 105-107)	Began: Nov. 11, 2002 Identified: Nov. 11, 2002 Resolved: Nov. 13, 2002	Resend Complete: Nov. 14, 2002 Delay Days: 1-3
AT&T LLNs Sent on Version 4.02 (Cottrell/ Lawson Joint Reply Aff. ¶¶ 108- 110)	Began: Dec. 9, 2002 Identified: Dec. 16, 2002 Resolved: Dec. 17, 2002	AT&T declined SBC's offer to resend the affected LLNs. (Cottrell/Lawson Joint Reply Aff. ¶ 110)
WorldCom Delimiter Issue (Cottrell/Lawson Joint Reply Aff. ¶¶ 111-113)	Began: January 31, 2002 Identified: Feb.5, 2003 Resolved: Feb. 6, 2002	WorldCom declined SBC's offer to resend the affected LLNs. (Cottrell/Lawson Joint Reply Aff. ¶ 112)

Change Management

15. **Please provide further support for Michigan Bell's statement that it would be expensive and complicated to make AT&T suggested change re: the versioning process, that is to change from using OCN level to the trading partner ID level.**

SBC supports three versions of its interface software at all times in all of its regions, including two LSOG versions, for the express purpose of providing CLECs ample time to implement the changes required to move from one version to the next. The programming that supports this versioning scheme is based on the fundamental assumption that a given

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[8] Delay is expressed as a range; delay varies according to the date that the LLN should have been provided.

CLEC will operate on one – and only one – version of interface software at a time. Transactions from that CLEC are identified by the CLEC's OCN, and the system is programmed such that any transaction received with that OCN is processed on the correct LSOR version.

SBC's versioning model was implemented in collaboration with the CLECs held in conjunction with both the 13-state CMP and the U&E POR. See Cottrell/Lawson Joint Reply Aff. ¶ 59. Having invested the time, money and expense of implementing versioning with the agreement of the CLECs, SBC should not now be required to undertake the additional time and expense to implement yet another versioning plan for the benefit of the CLECs, as a condition of 271 relief.

There are several considerations that make implementing the versioning scheme raised by AT&T both difficult and complex. First, undertaking the versioning changes requested by AT&T would require significant expenditure of time and resources on the part of SBC. See id. ¶ 65. Specifically, based on a high level analysis of what it would take to allow a single CLEC to submit PONS in more than one EDI version,[9] SBC determined that it would take approximately 10,000 hours to plan the change, modify documents, effectively communicate the change and retrain SBC's personnel. And, within SBC's Information Technology organization, a comparable amount of time would be required to plan the necessary changes and then to alter and deploy the software code.

Second, beyond the commitment of resources necessary to implement a fundamentally different versioning scheme, the practical aspects of implementing such a plan on SBC's operations also must be considered. The "one CLEC, one version" concept is central to all of SBC's ordering processes.   The work efforts of SBC's various CLEC support organizations (including the LSC, LOC, MCPSC, and IS Call Center) would be made much more complicated by the added burden of having to support more than one version per CLEC. In that vein, all process documentation, service-center training and external communications are geared to deal with versioning as it currently exists. The same is true for training of over 5,000 personnel who presently work with the current versioning scheme.

The complexity involved in managing the human aspects involved in a change of this type cannot be overstated – particularly given the CLECs' expectations of near perfect performance on the part of SBC and their unwillingness to assume any of the costs or risks associated with any problems that may occur as a result of changes of this type.

Finally, the wholesale change to SBC's versioning structure requested by AT&T is not necessary to meet its business needs. Instead, AT&T (and Covad, its line-splitting partner) could adopt one of the several alternatives suggested by SBC: (1) Covad could use LEX, which is version independent, to submit LSRs on AT&T's behalf; (2) Covad could use a Service Bureau Provider to submit its orders in the correct EDI format; (3) Covad could

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[9] Contrary to AT&T's assertion, the Trading Partner ID would not be an appropriate method to identify CLEC and LSOR version used by the CLEC. See Cottrell/Lawson Joint Reply Aff. ¶ 62. Rather, the most logical choice, based on discussion with CLECs, is by transaction, and in the case of ordering, that would be the Purchase Order Number ("PON").

design its systems to submit the one order type at issue here in the same version as AT&T's LSR, even if Covad's other LSRs are submitted using another version; or (4) AT&T could, itself, submit both line splitting orders. (Indeed, SBC's line splitting processes, most of which were developed at AT&T's request and with its concurrence, assume that the customer of record for the voice service is the one issuing the orders). Instead of adopting one of the reasonable solutions to this issue suggested by SBC (all of which require some effort by either AT&T or its business partner), AT&T seeks instead to place the burden on SBC. See id. ¶¶ 64-65.

SBC's current versioning plan has been approved as satisfying the requirements of the Act in both the Arkansas/Missouri and California 271 applications. Nothing with regard to that plan has changed in any respect. The only change at issue seems to be the CLECs' desire to do business in a different manner than they apparently anticipated at the time they were working with SBC to develop and implement its current versioning plan. The CLECs have other options available to them to accomplish their plans. The options currently made available to CLECs through SBC's versioning plans meet the requirements of the Act.

16. **In its reply comments at page 21 and Cottrell/Lawson Joint Reply Aff. para. 56, Michigan Bell states that it followed the change management procedures when it made changes to the final requirements for the LSOG 4 version. Specifically, Michigan Bell states that the changes were made as a result of "walkthrough sessions" and announced under the exception process. Please identify in the Change Management Process manual the provision that allows Michigan Bell to make these changes under the walkthrough sessions and the exception process.**

The SBC CLEC 13-State CMP was adopted in March 2001, the same month the LSOG 4 release was implemented. **Section 1.0** of the 13-State CMP provides: "Upon the effective date of this document, this Change Management process will be followed in all SBC regions unless specific processes are addressed in the Transition Plan. The Transition Plan is included as Appendix I of this document." See 13-State Interface Change Management Process: SBC and Competitive Local Exchange Carrier (CLEC), Version 1.1 (Dec. 12, 2000)) ("13 State-CMP") (App. C, Tab. 18, App. 5). Under Appendix I, the POR CMP governed the LSOG 4 release. The initial and final release requirement processes and intervals, as well as the exception process, are basically the same for both the POR and 13-State CMPs, although the 13-state CMP is more specific and detailed.

Below SBC provides the relevant cites to the SBC CLEC 13-State CMP for changes made to release requirements as a result of walk-through sessions, and pursuant to the CMP exception process. Also provided in footnotes are cites to the corresponding POR CMP provisions.

Pursuant to **Section 3.3.5.3** of the 13-state CMP,[10] SBC sponsors a walk-through of the initial requirements for the CLECs between days 14 and 19 of the 21-day CLEC comment

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[10] See SBC Competitive Local Exchange Carrier (CLEC) Interface POR Change Management Process § 3.2.8, attached as Exhibit 2 to this Attachment.

period following the distribution of the Initial Requirements.   The walk-through provides a forum for CLECs to review the release requirements, ask clarifying questions of SBC subject matter experts, and identify and discuss any errors discovered in the release documentation. Although most walk-throughs are held via conference call, many face-to-face meetings were held for the LSOR 4 and 5 requirements due to the scope of the changes being implemented. **Section 3.3.5.4** provides CLECs at least three business days following the walk-through to submit any additional comments. [11] Under **Section 3.3.5.5**, SBC then has three weeks to provide its responses to the CLEC comments, which include any changes to the requirements implemented as a result of matters that came to light during or after the walk-through. [12]

Under CMP **Section 3.3.6.1**, Final Requirements include: a summary of any changes resulting from the Initial Requirements walk-through; the implementation date of the new release; the sunset date of the old version; and reference to SBC's CLEC web site location where the detailed Final Release Requirements are stored. [13] Pursuant to **Section 3.3.6.2,** SBC schedules a conference call or meeting, within three to five business days after distribution of the Final Requirements, to discuss any changes made to the Final Requirements. [14]

Section 6.3 of the CMP, entitled "Exceptions," governs changes to final release requirements. [15] Under **Section 6.3.2**, if SBC proposes a change to final release requirements, it issues a Release Requirements Exception Accessible Letter. [16] Pursuant to **Section 6.3.2.1**, that letter contains the exception request, the reason for the request, and establishes the CLEC comment cycle. [17] Pursuant to **Section 6.3.1**, an exception must be agreed to <u>unanimously</u> by SBC and the CLECs. [18] **Section 6.3.2** specifies that, following applicable timelines, qualified CLECs may respond with questions and issues, and may raise objections to handling the proposed change as an exception. Lack of a response within the specified timeline indicates no objection. [19] Under **Section 6.3.2.3**, SBC proceeds to implement the change if no objection is made. [20]

All changes to the Final Requirements for the LSOG 4 release were made in accordance with these provisions of the 13-State and POR CMP processes. There were no objections to any LSOG 4 Exception Requests; all LSOG 4 changes were implemented in accordance with CMP requirements.

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[11] <u>Id.</u> § 3.2.9.

[12] <u>Id.</u> § 3.2.11.

[13] <u>Id.</u>

[14] <u>Id.</u>

[15] <u>Id.</u> § 5.2.

[16] <u>Id.</u> § 5.2.1.

[17] <u>Id.</u>

[18] <u>Id.</u>

[19] <u>Id.</u> § 5.2.2.

[20] <u>Id.</u> § 5.2.3.

Billing

17. Please provide the status of the reconciliation. Is it complete? Has the reconciliation caused the delay of competitive LEC BCNs and orders? Are any BCNs or orders currently being held on account of the reconciliation?

See March 14 Ex Parte, Attach. B, at 3 n.10.

18. Does the $17 million figure represent the total debits/credits to be assessed on competitive LEC bills? Does it exclude debits/credits that fall outside the time frames permitted by interconnection agreements?

See March 14 Ex Parte, Attach. B, at 2 n.7.

Loops

19. Re: "trouble ticket process" for conditioning loops with bridged taps under 2,500 feet, is Michigan Bell conditioning loops for its retail entity using the same process?

Michigan Bell does not provide xDSL service, and therefore has no occasion or reason to condition an xDSL-capable loop or HFPL for its retail services. However, Michigan Bell's advanced services affiliate, AADS, provides Wholesale DSL Transport Service in Michigan. AADS's interconnection agreement with Michigan Bell has been amended to include the terms and conditions for removal of non-excessive bridged tap as announced in CLECAM02-079 (Feb. 28, 2002) (App. H, Tab 26). See Chapman/Cottrell Joint Reply Aff. ¶ 33 & n.46 (Reply App., Tab 4). AADS requests the removal of non-excessive bridged tap pursuant to the same trouble ticket process available to unaffiliated carriers.

20. How frequently are CLECs are requesting removal of non-excessive bridged taps?

Very infrequently. Between July 2002 and February 2003, Michigan Bell processed fewer than 100 requests for the removal of non-excessive bridged tap under its standard removal of non-excessive bridged tap offering. All of these requests came from AADS.

21. Is there a reason why Michigan Bell wouldn't now adopt a standardized offering (not trouble ticket process) given apparent higher demand?

As indicated above, the demand for the removal of non-excessive bridged tap is relatively low. Nonetheless, Michigan Bell is currently exploring the feasibility of developing an LSR ordering process for the removal of non-excessive bridged tap.

22. Is there a reason why bridged taps longer than 2,500 feet and those shorter than 2,500 feet are different?

"Bridged tap" is any section of a cable pair not on the direct electrical path between the central office and the end user's location. It is similar to unused tracks branching off the main line of a rail road. When located on a cable pair, bridged tap increases the amount of resistance on the pair. It is the same as adding additional footage to the pair itself. Digital services (such as xDSL) are designed and tested to handle a certain amount of resistance without any degradation of the signal. When industry testing was performed to determined standards for xDSL services, it was determined that total bridged tap length of 2,500 feet or less does not, as a general rule, degrade the transmission of data signals to a point where the loop is unsuitable for xDSL service. If total bridged tap is more than 2,500 feet, however, the signal starts to degrade and possibly becomes unusable. Thus, the industry standard for the point at which bridged tap on a loop is <u>excessive</u> (<u>i.e.</u>, presumptively needs to be removed for the loop to be suitable for xDSL service) is 2500 feet. <u>See</u> Chapman/Cottrell Joint Reply Aff. ¶ 31; <u>see also</u> CLECAM02-192, n.2 (citing ANSI T1.417-2001 [Spectrum Management for Loop Transmission System] Annex B, section B.1.3, subsection C, entitled "Total bridged tap length may not exceed 2.5-kft. No single bridged tap may exceed 2.0-kft.")(App. H, Tab 29).

Line Splitting

23. Please expand on why Michigan Bell cannot use the existing loop in a line splitting-to-UNE-P scenario. In its reply, Michigan Bell stated that it needed to ensure that the loop was voice grade, but if it was previously used for line splitting, the CLEC would know it can support voice service.

When Michigan Bell provides UNE-P for basic analog voice service to a CLEC, it provides a switch port and a <u>voice-grade</u> loop. <u>See</u> Chapman/Cottrell Joint Reply Aff. ¶ 5. A "voice-grade" loop means a loop that meets the technical standards a loop must meet for Michigan Bell-quality voice service. In fact, the terms and conditions of Michigan Bell's basic analog voice-grade UNE-P product offering to CLECs <u>require</u> Michigan Bell to meet specific standards for a "voice grade" loop when it is provisioned as part of a UNE-P to a CLEC; this ensures that a CLEC customer receiving voice service over UNE-P does not receive a lower quality voice service than the customer would receive if he or she were a Michigan Bell voice customer.

In contrast, when a CLEC orders UNEs to be used in a line splitting arrangement, it typically receives a switch port and an <u>xDSL-capable</u> loop. An "xDSL capable" loop is a

non-loaded copper loop[21] that may be used for the provision of DSL service but which does not necessary meet the technical standards for Michigan Bell voice service. The typical reason an xDSL-capable loop would not meet the technical standards for a Michigan Bell voice grade standard would be because it has been conditioned. Such conditioning, while making a loop suitable for xDSL service, may have made it unsuitable for Michigan Bell voice service.

When Michigan Bell has provisioned an xDSL-capable loop to a CLEC, Michigan Bell has no way of knowing what services, or combination of services, the CLEC (or partnering CLECs) is actually provisioning over the xDSL capable loop. Michigan Bell also has no way of knowing what *quality* of service the CLEC (or partnering CLECs) is provisioning over the loop. This is particularly true with respect to any voice service that may be provided over an xDSL-capable loop, because the loop may or may not have been conditioned to a point where it is no longer meets the technical standards for a Michigan Bell "voice grade" loop. In other words, the CLEC, or partnering CLECs, may be providing voice service of lower quality than that provided by Michigan Bell). Thus, the fact that a loop was previously used by a CLEC, or partnering CLECs, as part of a line splitting arrangement would not provide assurance to Michigan Bell that the loop is a "voice grade" loop – and that would be true even if Michigan Bell had knowledge that a particular xDSL-capable loop in a line splitting arrangement was actually used by the CLEC, or partnering CLECs, to provide analog voice service. (In fact, Michigan Bell would have no such knowledge.) For this reason, when a CLEC seeks to "convert back" a stand-alone ULS-ST port to UNE-P, Michigan Bell does not use the existing xDSL capable loop, but instead provisions a voice grade loop to effectuate the arrangement.

Track A

24. Which interconnection agreements are you relying on for Track A purposes? The 11 most significant agreements?

Although SBC's Track A showing is not limited to these carriers, SBC primarily relies on the following carriers: AT&T, McLeodUSA, Talk America, TDS Metrocom and WorldCom. See Heritage Aff. ¶ 5 (App. A, Tab 16). Each of these carriers is operating pursuant to an effective Michigan PSC-approved interconnection agreement (or agreements) in Michigan, as summarized in the revised Attachment B to the Affidavit of Robin M Gleason. See Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC (Jan. 17, 2003), Attach. 2.

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[21] Removal of load coils on an xDSL-capable loop is optional; however, xDSL signals cannot be transmitted over load coils.

Attachment A

Exhibit 1

Date: **March 14, 2003**   Number: **CLECAMS03-021**

Effective Date: **N/A**   Category: **OSS**

Subject: **Follow-up on Line Loss Notifications Sent in Error**

Related Letters: **CLECAMS03-019**   Attachment: **No**

States Impacted: **SBC Midwest Region 5-State**

Issuing SBC ILECS: **SBC Illinois, SBC Indiana, SBC Michigan, SBC Ohio and SBC Wisconsin (collectively referred to for purposes of this Accessible Letter as "SBC Midwest Region 5-State")**

Response Deadline: **NA**   Contact: **Account Manager**

Conference Call/Meeting: **N/A**

This is a follow-up to Accessible Letter **CLECAMS03-019** to provide CLECs with more information regarding the Line Loss Notification issue identified on 3/5/03 in the SBC Midwest Region 5-State. A fix for the problem was identified and was successfully deployed on March 7, 2003. Associated Line Loss Notifications have been validated as being correct since that time. The scenarios which were subject to the error were limited.

The problem occurred only when the following conditions existed and only in SBC Midwest Region 5-State:

- The winning CLEC had to be using LSOG 5
- The winning CLEC was converting only part of a multiline account, where the main TN used to identify the multiline scenario was being converted
- Under this scenario, another line that was not the original main TN gets repositioned on the remaining record to be the new main TN for the lines that remain with the existing carrier
- The system created an LLN for both the original main TN, which was correct, and the newly created main TN, which was not correct as it was not lost

The first occurrence of this problem was in May 2002, although it was not observed because of the limited occurrence of the scenario. The total count of all LLNs sent in error is 908. Thirty-eight CLECs received these LLNs. All affected CLECs will be contacted directly by their OSS Manager and provided specific information about their transactions and the volume affected.

Attachment A

Exhibit 2

SBC
Competitive Local Exchange Carrier (CLEC)

Interface
POR Change Management Process

1.0   Purpose

This document contains the standards for the Plan of Record Change Management Process ("POR CMP") by which SBC Communications (hereinafter referred to as "SBC", consisting of Ameritech, Nevada Bell, Pacific Bell, Southwestern Bell Telephone, and Southern New England Telephone) will notify Competitive Local Exchange Carriers ("CLECs") of changes to the Operational Support Systems ("OSS") interfaces, introduction of new interfaces and retirement of interfaces detailed below and provides for the identification and resolution of CLEC issues associated with the CMP for the purpose of implementing this Uniform and Enhanced OSS Plan of Record ("POR"). Interfaces as used in this document are intended to include the common platform components, which provide the functionality delivered via the actual interface to the CLEC. CLECs are defined as the Competitive Local Exchange Carriers, their authorized representatives, or their agents (hereby referred to as "CLECs"). The PORCMP is intended to establish a structural means by which the SBC POR is implemented. The parties intend for the POR CMP to be dynamic in nature, managed through regularly scheduled meetings (as set forth in the Implementation Phase Work Schedule contained in Section III(I)) and based on group consensus (See Section 7.2. "Change Management Process Meetings"). This document may be revised if SBC and CLECs jointly agree to those revisions.

1.1 Use of the POR CMP for the Implementation Phase Work Schedule

Pursuant to Paragraph 28(b) of the SBC/Ameritech merger conditions, this POR CMP shall govern the Implementation Phase Work Schedule contained in Section III(I). This POR CMP shall also govern the Transition Plan (attached hereto as Appendix I) from the 13 State Present Method of Operation ("PMO") to the Future Method of Operation ("FMO") (as defined in the Plan of Record ("POR")) for all aspects of the transition to Uniform and Enhanced OSS that are not addressed in the Implementation Phase Work Schedule, including but not limited to updates to the CLEC Handbook, escalation procedures and other CLEC support functions as identified in Appendix I.

2.0   Scope

2.1 This process pertains to all pre-ordering, ordering, provisioning, and maintenance electronic interfaces, specific to CLEC end-user's local services ordering only, including, but not limited to, SBC's Application-to-Application Interfaces and Graphical User Interfaces ("GUI"), as identified in the Implementation Phase Work Schedule contained in Section III(I) of the POR.
SBC will continue to develop its Uniform and Enhanced Interfaces according to industry guidelines (as discussed in Section 3.2.1 of this document) for wholesale customers to order and maintain Local Services. As industry guidelines evolve, SBC will use the POR

CMP within the framework of the Implementation Phase Work Schedule to review the guidelines and determine appropriate implementation choices.

2.2 This document applies to SBC and all CLECs operating in Arkansas, California, Connecticut, Illinois, Indiana, Kansas, Michigan, Missouri, Nevada, Ohio, Oklahoma, Texas and Wisconsin for purposes of implementing the POR.

2.3 CLEC User Forums will not be utilized to address/resolve any aspects of the POR, without CLEC consent.

3.0 Implementation of POR FMO Interfaces

3.1 Two Types of POR FMO Interfaces

The POR CMP manages the movement from the PMO environment to the FMO environment as described in the POR. Such changes may encompass:

- Category One (Gateway) include gateway applications, such as Electronic Data Interchange ("EDI") Ordering, EDI/Common Object Request Broker Architecture ("CORBA"), Electronic Bonding Trouble Administration ("EBTA"), and DataGate Pre-Ordering.

- Category Two (GUI) is solely for GUIs where the change is specific to a GUI (As listed in the FMO Table XX).

3.2 Implementation of Category One (Gateway) and Category Two (GUI) Interface Processes (Appendix A)

3.2.1 For Gateway interfaces based on industry guidelines, the parties agree that the guidelines developed at the industry forums i.e., Alliance for Telecommunications Industry Solutions ("ATIS"), Ordering and Billing Forum ("OBF") will be the basis for managing change. SBC anticipates using applicable OBF Guidelines. If SBC or the CLECs believe that a variance to an industry standard or guideline is warranted, the decision to implement or not implement the variance will be made collaboratively in accordance with the Implementation Phase Work Schedule, in Section III(I) of the POR. If no industry guideline exists, SBC will work within the POR Implementation Phase Work Schedule to obtain CLEC consensus on interim guidelines until industry guidelines are adopted. SBC will provide technical EDI specifications as part of the requirements definition in accordance with the format that has been jointly agreed to by the SBC and CLEC communities per the Documentation Forum. SBC will also consider changes recommended by CLECs through the Change Request Process (see Section 7.3).

3.2.2 SBC will prepare a preliminary 12 month package of the implementation schedule for Uniform and Enhanced OSS Interfaces as well as any other changes to any currently supported Category One or Category Two OSS interfaces or any proposed new Category One or Category Two OSS interfaces and share these plans beginning with the next regularly scheduled Change Management meetings held upon completion of Phase II of the

Uniform and Enhanced OSS POR described in Paragraph 28B of the SBC/Ameritech Merger Conditions. Each Change Management meeting (See Section 7.2. "Change Management Process Meetings") will include a standing agenda item for updates related to POR implementation activity. SBC will provide its updated plans as part of its 12-Month Development View on a quarterly basis or more often as necessary (see Managing the PORCMP, Section 7).

3.2.3 In addition to the information required pursuant to the Implementation Phase Work Schedule contained in Section III(I) of the POR, SBC will provide a **Release Announcement** covering the four regions which will be delivered to CLECs via an Accessible Letter for the pre-order/order interfaces to be deployed as part of the Implementation Phase Work Schedule on the date SBC/Ameritech delivers Category I, II, and III FMO draft data as set forth in Section III(I) of the POR.[36] The letter will contain a written summary of the change(s) in plain English, a target timeframe for implementation, any cross reference to industry documentation, and any known exceptions to industry guidelines.

3.2.4 If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via e-mail, fax or regular mail) to the SBC POR Change Management Point of Contact ("POR CMPOC", defined in Section 7.1) and the CLEC's Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The CLEC response must be received by the SBC POR CMPOC and the CLEC Account Manager in writing within 7 calendar days.

3.2.5 SBC will review all CLEC responses.

3.2.6 Within seven (7) calendar days of the end of the time period specified in Step 3.2.4, SBC will provide written answers to CLEC questions via Accessible Letter. SBC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC.

3.2.7 If SBC announces any changes before applicable guidelines are finalized at the ATIS/OBF industry forums, SBC will review the final guidelines when they are issued for any alterations that may be necessary for compliance with the finalized requirements and will work these changes within the standards of this CMP. If SBC or the CLECs believe that a variance to an industry standard or guideline is warranted, the decision to implement or

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[36] In all cases, the date of any Accessible Letter referenced in this Agreement will be the date on which SBC e-mails the document to CLECs. Provided, however, that any Accessible Letter transmitted by e-mail after 4:00 PM Central Time shall be considered as transmitted the next business day. SBC will send the Accessible Letters to the contact(s) designated by the CLEC on the CLEC profile. It is each CLEC's responsibility to ensure that SBC has a current contact list.

not implement the variance will be made collaboratively in accordance with the Implementation Phase Work Schedule, in Section III(I) of the POR.

3.2.8 Fourteen calendar days after SBC provides to CLECs the draft Category IV data as set forth in section III(I) of the POR, SBC will deliver to CLECs via Accessible Letter the **Initial Release Requirements** for each pre-order/order interface in each region to be implemented as part of the POR. For Category One interfaces, the Initial Release Requirements will contain the planned implementation date, Index of Changes, updated interface requirements (e.g., Local Service Pre-Order Requirements ("LSPOR") changes, Local Service Ordering Requirements ("LSOR") changes, and EDI mapping), exceptions to transaction sets or data models, industry cross reference, reporting impacts, (if any), and timeframes for CLEC joint testing. In setting the timeframes for CLEC joint testing, SBC will provide CLECs with a period not less than 67 days prior to the Implementation date for each interface. For Category Two interfaces, the Initial Release Requirements will contain a written summary of the change(s) in plain English, a target timeframe for implementation, any cross-reference to updated User Guide or revised User Guide pages and timeframes for CLEC testing. Uniform Ordering GUI (LEX) changes associated with the LSR will be handled on a timeline to allow for the 60-day test window. The Initial Walk-thru for Category One and Two interfaces (see Appendix J Walk-thru criteria) shall occur as part of the SBC/CLEC Collaborative on Category IV Data as described in Section III(I) of the POR with the appropriate SBC/Ameritech subject matter experts. Implementation will occur in accordance with the Implementation Phase Work Schedule contained in Section III(I) of the POR.

3.2.9 If a CLEC identifies issues or requires clarification (including issues with the planned implementation timeline and testing windows), the CLEC must send a written response (via e-mail, fax or regular mail) to the SBC POR CMPOC and the CLEC's Account Manager, which must be received not later than the 21st calendar day after the date of the Initial Release Requirements.

3.2.10 SBC will review all CLEC responses to the Initial Release Requirements.

3.2.11 Within 14 calendar days of the date identified in 3.2.9 above, SBC will provide written answers to CLEC questions via an e-mail Accessible Letter. SBC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Those issues will be discussed in the SBC/CLEC Collaborative on Category IV Data. Any changes that occur as a result of the collaborative will be included in the **Final Release Requirements**, which will include a summary of changes from Step 3.2.8 above (Index of Changes), implementation date of the new version, screen representations reflecting any changes to the GUI screens, the sunset date of the old version and reference to SBC's CLEC web site location where the detailed Final Release Requirements are stored. The Final Release Requirements will be provided to CLECs within 14 calendar days of the conclusion of the SBC/CLEC Collaborative on Category IV Data. SBC will conduct a conference call or meeting, within three business days after distribution of the

Final Release Requirements, to discuss any changes made to the Final Requirements. CLECs will have 14 calendar days to accept the Final Release Requirements provided by SBC. The implementation timeline for the release will not begin until all related documentation is provided.

3.2.12 Should a CLEC elect to initiate the **Outstanding Issue Solution (OIS)** process (as described in Section 6 of this PORCMP) **related to the Final Release Requirements** for Category One or Category Two Changes, the CLEC must send a written notice (via e-mail, fax or regular mail) to the SBC POR-CMPOC and the CLEC's Account Manager, which must be received within seven (7) calendar days from the date of the Final Release Requirements for App to App and GUI Pre-Ordering and Ordering interfaces.

3.2.13 Upon receipt of a CLEC OIS notice relating to such Final Release Requirements, SBC will conduct an OIS conference call for 2:00 PM Central Time, seven (7) calendar days after the due date for the OIS notices (14 calendar days after the date of the Final Release Requirements). Additional procedures for an OIS related to such Final Release Requirements are as specified in Section 6.0 of this document.

3.2.14 Once the CLEC customers accept SBC's proposed Final Release Requirements, the implementation time line contained in the Implementation Phase Work Schedule in Section III(I) of the POR will begin. Testing, as defined in the CLEC Joint Testing section of the FMO contained in the POR, will be conducted, as defined in this section, by SBC and any interested CLEC. Testing will continue until the agreed upon testing exit criteria have been satisfied, in accordance with a negotiated joint release test plan, to the mutual satisfaction of the parties.
   a. SBC will make testing available in accordance with the timeframes specified in the Final Release Requirements above. The available testing timeframe shall be no less than 60 calendar days for Category One interfaces.
   b. For the Uniform Ordering GUI (LEX) LSR changes, SBC will provide CLECs access to the test environment in accordance with the timeframes specified in the Final Release Requirements. The available testing timeframe shall be no less than 60 calendar days.
   c. Testing must be scheduled to end at least seven (7) calendar days prior to the scheduled implementation date, unless otherwise agreed between SBC and the CLEC. This seven-day period is to accommodate the software freeze in preparation of the release, and to provide CLECs an opportunity to invoke an OIS, if necessary as a result of release testing, as described in Section 6.0 of this document.

3.2.15 If the parties cannot agree on whether the test criteria have been satisfied within the planned timeframe, either SBC or the CLEC may invoke a second **OIS process related to Gateway Implementation**, using the eligibility requirements and timeline defined in Section 6.0 of this document.

3.2.16 If no Gateway Implementation OIS is initiated after the completion of joint testing (or after successful conclusion of any such OIS), SBC will implement the new release or updates.

3.3 Versioning of Gateway Releases

3.3.1 SBC will support three versions of software at all times for its EDI Ordering and EDI/CORBA Pre-Ordering interfaces. The last dot release of the retired LSOG will be supported until the next LSOG is implemented. The other two versions supported will either be the latest two dot versions or in the case of initial implementation of an LSOG, the new LSOG and the next to last dot release of the retired LSOG. Sunset of the oldest LSOG will occur on the implementation date of the newest LSOG version.

3.3.1.1 In the time period before each region moves to the Uniform OSS platform as defined in the SBC/Ameritech merger conditions, SBC will implement support for two versions as outlined in the release requirements for the July 22, 2000 EDI release scheduled for the SWBT and PB/NB regions. SBC will maintain Issue 7 in the Ameritech region in the interim period through the implementation of the Uniform OSS platform. After implementation of the common platform, all regions will be supported by three versions as defined in this section.

3.3.2 For example, if LSOG 4 is being implemented and the interface is currently on LSOG2.3, before implementation the versions available to the CLEC would be LSOG2.3, LSOG 2.2 and LSOG1.3 (the last dot release of LSOG1). When LSOG4 is implemented, LSOG 1.3 would retire and LSOG 2.3, LSOG 2.2 and LSOG4 would be available. When LSOG4.1 is implemented, the CLECs could use LSOG 2.3 (which will be supported until the NEXT major LSOG release), LSOG4 and LSOG4.1.

	1	2	3	4	5	6	7	8	9	10	11	12
LSOG 1.3	teal	teal	teal	teal								
LSOG 2.2			yellow	teal	teal							
LSOG 2.3				yellow	teal	teal	teal	teal				
LSOG 4.0					yellow	teal						
LSOG 4.1						yellow	teal					
LSOG 4.2							yellow	teal	teal			
LSOG 4.3								yellow	teal	teal	teal	teal
LSOG 5.0									yellow			

3.3.3 For emergency fixes that may be required to correct problems in software releases, other than scheduled quarterly releases, the version number will not be incremented and

will not cause the oldest dot version of the current LSOG to be retired as a result of the implemented fix.

3.3.4 For mandated changes that must occur between regularly scheduled releases, SBC will not retire the oldest version in order to implement the mandated change. The mandated change will be implemented as sub dot releases of all versions, unless the mandated change could not be accommodated by the structure or intent of the old LSOG version. For example, if the structure of the old LSOG version supported a field at the LSR level while the new mandate required the field to be supported at the Line level, this change could impact the architecture of the system and database. Each instance would need to be evaluated on a case-by-case basis.

3.3.5 SBC's DataGate Pre-Ordering interface utilizes similar versioning patterns. SBC will support three versions of software, the current version and the two past versions. SBC's release announcement of a new DataGate version will constitute notification of sunset for the oldest DataGate version and will include notification of the specific version of DataGate that will sunset with the new release. Upon implementation of the newest release, SBC will no longer support the oldest version.

3.3.6 SBC makes available one version of a GUI at any given time.

4.0 Retirement of Existing Interfaces

4.1 Retirement Groups
This process divides the retirement of all interfaces in the scope of this document into two groups:
- Group A: retail interfaces (see Appendix A)
- Group B: wholesale interfaces (see Appendix A)
  - Category 1: Gateway applications
  - Category 2: GUI applications

4.2 Interface Retirement Process

4.2.1 Prior to sending a Retirement Notice, **SBC will share its initial plans** for retirement of existing interfaces at a scheduled CMP meeting. During that scheduled meeting, SBC will explain the rationale for retiring the interface, where the replacement functionality resides or where it will exist in production at least six months prior to the scheduled retirement date, its plans to maintain the interface for a specified period of time, and its target date for the Retirement Notice.

4.2.2 SBC will announce the retirement of the interface in a **Retirement Notice** delivered to CLECs via an e-mail Accessible Letter. The letter will contain a written summary of the

retirement plans in plain English and a retirement date. The letter will also specify the interfaces where comparable functionality currently exists or will exist in production at least six months prior to the scheduled retirement date. Once an interface with comparable functionality is in production, no CLEC may begin to use (i.e., "turn up" for the first time) the interface that is scheduled for retirement. For retirement of interfaces, SBC will provide the following notice (broken out by Interface Group) from the time of the Retirement Notice to the retirement of the interface, unless SBC invokes the use of the Exception process, as described in Section 5.2.

- Group A: 12 months
- Group B:
  - Category 1: 24 months
  - Category 2: 12 months

4.2.3 If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via e-mail, fax or regular mail) to the SBC POR-CMPOC and the CLEC's Account Manager, which must be received no later than the 21st calendar day following the date of the Retirement Notice. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations.

4.2.4 SBC will review all CLEC responses.

4.2.5 Not later than the 21st calendar day following the end of the period specified in Step 4.2.3, SBC will provide written answers to CLEC questions via an e-mail Accessible Letter. SBC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This will constitute the **Final Retirement Notice**, which will include the retirement date and any changes in Step 4.2.2 above.

4.2.6 With respect to retirement of Group B interfaces only, a CLEC may elect to use the **OIS process**. Should a CLEC elect to initiate the process described in Section 6.0, the CLEC must send a written notice (via e-mail, fax or regular mail) to the SBC POR-CMPOC and its Account Manager, which must be received at least 30 calendar days prior to the scheduled retirement date.

4.2.7 Upon receipt of a CLEC OIS notice related to such Final Retirement Notice, SBC will schedule an OIS conference call for 2:00 PM Central Time, seven (7) calendar days after the due date of the OIS notices.

4.2.8 If no OIS is initiated, (or after successful conclusion of any OIS), SBC will retire the interface on the retirement date announced.

5.0 Other Items

5.1 Emergency Situations Related to a Release

5.1.1 Operational Points of Contact (OPOC)
Each CLEC will designate primary and secondary Operational Points of Contact (OPOC) for the regions in which it operates. The OPOC will serve as the CLECs' official designee for notifications on all emergency situations related to releases. The CLECs must provide the OPOCs' names, telephone numbers, e-mail addresses and fax numbers to the POR-CMPOC and the CLEC's Account Managers. SBC will create the OPOC list. It is SBC and the CLEC's responsibility to maintain and update the information on the list.

5.1.2 Emergency releases or emergency implementation date changes will be handled as special cases.

5.1.3 Emergency releases are releases that address major software problems, production system failure or an interface failure. These also include releases that address significant production problems, the failure of scheduled release enhancements and the failure of pre-existing functionality.

5.1.4 The notification process interval will be handled on a case-by-case basis and will depend on the type and extent of the emergency. Notification to the CLECs will be sent as soon as reasonably practicable after the emergency is recognized. The emergency notification may not be in the form of an Accessible Letter, and may be sent via other expedited means (e.g., fax, e-mail or phone call).

5.1.5 In emergency situations, mutual testing and problem resolution will be conducted through the OSS contacts for all companies involved. Disagreements regarding the existence of an emergency situation shall be resolved through invoking an OIS, as described in Section 6.0, and/or escalation and may be brought before the appropriate regulatory body.
Should a release have a major problem which has a significant impact to a CLEC, the CLEC or SBC may invoke an OIS where a remedy to the emergency situation, including backout and recovery considerations, will be decided.

5.2 Exceptions

5.2.1 Above and beyond the need to handle emergency situations, the parties recognize the need to occasionally allow for other exceptions to the PORCMP described herein. However, because it will be difficult for SBC or other CLECs to accurately assess the impact of SBC's proposed change on any given CLEC's current or future development, any agreement to deviate from the PORCMP shall be agreed to unanimously by Qualified CLECs and SBC. If SBC or CLECs wish to propose that a specified change, introduction of a new interface or retirement of an interface be handled on an exception basis, SBC will

issue a Release (or Retirement) Requirements Exception Accessible Letter, which indicates that an exception is requested following the conclusion of a reply and comment cycle.

5.2.2 Following the timelines outlined in this document, CLECs may respond with questions and issues. SBC may request that the question and comment period be expedited as part of the exception. This expedited comment cycle would also be open to CLEC comment. Qualified CLECs as defined in Section 6.4 of this document, may indicate objections to handling the change, new interface or retirement as an exception. Lack of a response within the specified timeline indicates no objection.

5.2.3 SBC may proceed to implement the change, new interface or retirement on an exception basis only if there are no outstanding issues, or CLEC objections at the end of the CLEC response cycle specified in Step 6.2.2 above.

5.2.4 Regulatory mandated changes, whereby a regulatory body specifically orders expanded or modified functionality within a mandated timeframe that does not allow for the timelines specified in the CMP, will not be subject to the objection process for exceptions. If necessary, objections to the mandated change, the method for handling the mandated change, or the associated timeline may be taken to the applicable regulatory bodies. In the Accessible Letter notification, SBC will provide any modified timelines for the change. If no such timeframe is specified, regulatory mandated change shall be subject to the CMP process as described in this document. SBC and the CLECs will where possible make every effort to encourage regulators to follow the PORCMP timeline for mandated changes.

5.2.5 SBC/Ameritech merger related requirements are not considered mandated changes and shall follow the PORCMP.

5.3 Training
All changes to existing interfaces, as well as the introduction of new interfaces, will be incorporated into external CLEC training and SBC's internal processes for updating employees on changes to CLEC and its own retail systems. This includes updating external CLEC training, and internal training and applicable Methods and Procedures (M&P).
All parties agree that information regarding changes to the interfaces, as well as information regarding new interfaces, needs to be communicated and coordinated with end users and support personnel to ensure effective implementation.

5.4 Documentation Change
CLECs will be notified (via Accessible Letter) of Changes that impact OSS related documentation (e.g., LSOR, LSPOR, User Guide, ESO User Guide, RSOG, etc.). The applicable documentation on the SBC CLEC web site will be updated as defined in the written notification.

5.5 CLEC Testing

5.5.1 Existing Interfaces

For interfaces contained in the Implementation Phase Work Schedule contained in Section III(I) of the POR, CLEC joint testing will be conducted for Category One and the Uniform Ordering GUI (LEX) as defined in the CLEC Joint Testing section of the FMO contained in this POR. Where applicable, SBC and CLECs will perform Category One and Category Two (Uniform Ordering GUI "LEX") interface testing as negotiated by the parties and documented in a customized test plan. SBC maintains a Joint Release Test Plan template on its CLEC web site that may be used in the development of the customized test plan. Each testing party will meet with SBC and agree on its own set of test scenarios that will be included in the test, applicable entrance and exit criteria and a test schedule. Regression testing will be supported in limited scenarios as agreed upon in the documented test plan. A limited number of test accounts will be made available during CLEC testing. Should the parties not agree that a successful test was achieved within the specified interval, either SBC or the CLEC may initiate an OIS, as described in Section 6.0.

If an OIS call is requested based on the results of joint CLEC testing, the call will be held the Tuesday prior to the scheduled release. A Qualified CLEC, as defined in Section 6.4 of this document, must notify the SBC POR-CMPOC and the CLEC's Account Manager in writing by 12:00 PM Central Time on the Monday prior to the scheduled release implementation.

5.6 SBC Resolution of POR Issues and Responses to CLEC issues

SBC will respond to CLEC OSS POR issues in a timely manner. When a POR related issue is identified or CLECs require a response from SBC, the CLECs and SBC will agree on a timeframe for response and/or resolution to an issue. The issues related to POR will be worked through regular operational channels once the release is in production. The POR-CMPOC will monitor issues related to POR implementation. Type and Severity of the problem or issue will dictate the timeframe for resolution and the method used to work the issue.

1. CLEC Responsibilities:

    a. Submit issues in writing to the SBC POR CMPOC.

    b. For issues related to the implementation of a POR release that is already in production, the CLEC will provide backup information, where possible, in the form of examples to both the operational team working on the issue and the POR CMPOC.

    c. Identify the severity of the POR related issue and the timeliness required for response to the issue.

    d. Inform the SBC POR CMPOC of any customer affecting outage issues related to POR implementation that are being worked through regular escalation processes.

2. SBC POR CMPOC Responsibilities:

    a.   Provide written response to the CLEC acknowledging that the POR Issues have been received.

    b.   Request additional information regarding the POR issues when necessary.

    c.   Log the POR issues with date and time received .

    d.   Engage resources within SBC to determine an expected resolution time.

    e.   Prepare response to the CLEC which provides the resolution or a timeframe for delivery of a resolution.

5.7 Changes to Legacy/Backend Systems for Pre-Order, Ordering, and Provisioning

SBC will post backend/legacy system changes to the SBC CLEC website to inform CLECs of possible impact to CLEC ordering ability.

6.0 Outstanding Issue Solution

The OIS process may be invoked in the instances described above.

6.1 Process Initiation

The initiating CLEC will provide the SBC POR CMPOC and the CLEC's Account Manager with written notification (via fax, e-mail, or regular mail) of the outstanding issue(s). This notice will include the disputing party's reason(s) for raising the dispute and any alternative recommendations. The CLEC initiating an OIS shall provide a bridge number for the conference call with its initiation notice. In the event more than one CLEC initiates an OIS, SBC shall coordinate with the initiating CLECs to determine which bridge number to use. SBC will notify by e-mail all primary and secondary CLECs' CMPOCs as defined in Section 7.1.

6.2 Issue Timeline

In accordance with the appropriate timelines as set out in the above sections of this document, SBC will publish a summary of all CLEC dispute(s) which will include SBC's position on those disputes. As soon as reasonably practicable after SBC's receipt of the OIS initiation notices, but in no event later than one (1) business day before the call, SBC will notify the CLECs (via e-mail Accessible Letter) that there is a dispute along with the date, time and bridge for the voting call. Depending on the outcome of an OIS or open issue, CLECs and/or SBC may request a delay of the implementation date.

All parties agree that it is in their mutual interest to expedite the deliverables that are due during the OIS process. All CLECs, including those not qualified to vote in the OIS process, may participate on the OIS calls.

6.3 Dispute Vote

If the parties are unable to reach a solution, a dispute vote may be called by any Qualified CLEC. Discussion on the voting call may include:

- a dialogue for the opposing views

- impacts of a "No" vote on the remainder of the release or other connected releases (applies to changes to existing interfaces only)

- discussion of options

   The vote by Qualified CLECs during the call will resolve the question appropriate to the particular category (e.g., change to existing interface, introduction of new interface or retirement of interface) as follows:

6.3.1 Permitted Votes: The allowed votes are "Yes," "No" and "Abstain". In the event of a "No" vote, CLECs and SBC will discuss options for implementing a partial release.

6.3.2 Retirement of Interfaces: Has SBC provided comparable functionality? The allowed votes are "Yes," "No" and "Abstain".
In the event of a "yes" vote (allowing SBC to retire the interface in the timeframe SBC defined), CLECs who have an interest in continuing to use the retiring interface, beyond the retirement date, should initiate two-party negotiations with SBC. These negotiations will include, but will not be limited to, discussions of the ongoing costs of maintaining a customized interface and its ultimate obsolescence. The OIS process does not apply in this instance.

6.3.3 Post Implementation Emergency Situations: Should SBC begin backout and recovery process? The allowed votes are "Yes," "No" and "Abstain".

6.4 Qualified CLECs

A dispute vote may be necessary on either the 13-state uniform platform or in the case of region specific systems the vote might apply to individual regions only. . To qualify to vote, CLECs must meet the requirements as defined in this section.

6.4.1 Final Release Requirements: If the OIS relates to Final Release Requirements, Qualified CLECs must meet the following criteria to participate in a dispute vote:

- CLECs with a documented intent to implement an FMO interface within six months of SBC's planned implementation or CLECs in production on a PMO interface and providing service to paying customers are considered qualified. Documented intent is further defined as:

  - either a CLEC with a signed Interconnection Agreement ("ICA"), or

- one who is negotiating terms and conditions for access to the interface, subject to acceptable substantiation and sanctioned by a majority vote of the other Qualified CLECs.

- In the case of an OIS relating to Final Release Requirements, both the Uniform Ordering GUI (LEX) and EDI users meeting the above criteria are qualified to vote on LSOR changes.

6.4.2 Post Implementation Emergency Situations

If the OIS relates to a post implementation emergency situation, Qualified CLECs, as defined in this section, must be on the release in question (and may be the Uniform Ordering GUI "LEX" or EDI users) to participate in a dispute vote.

6.4.3 Retirement of Interfaces

If the OIS relates to the retirement of an interface, Qualified CLECs must meet the following criteria to participate in a dispute vote:
CLECs who are currently live production users of the retiring interface.
SBC is qualified to vote in OIS on retirement of interfaces.

6.5 Voting Process

If agreement cannot be reached, any OIS shall be resolved by a dispute vote.

A 50% quorum of all Qualified CLECs (as defined above) is required for a dispute vote to be held. If the dispute involves a release on the uniform platform, the quorum must include 50% of qualified CLECs in that region. If a quorum is established, a 51% vote of the quorum (i.e., a simple majority vote) is required to change a release requirement, delay implementation of an EDI release, backout a release, or delay retirement of an interface. For OIS on Final Release Requirements dealing with LSOR/common platform document changes, if a 50% quorum of all Qualified CLECs is not established, the vote can still be held if 50% quorum of Qualified CLECs utilizing EDI is established. In the event of a tie, or if no quorum is established, then SBC shall proceed to change, implement, or retire the interface as specified in the Final Release Requirements.

The voting requirements and the qualification criteria listed in this section and the sections above apply in the same way to the Uniform pre-order applications including EDI/CORBA. A corporation, including all affiliates, is entitled to a single vote, unless the corporation can convince a majority of other Qualified CLECs that it has a legitimate need or right for multiple votes.

7.0 Managing the POR Change Management Process

7.1 POR Change Management Points of Contact (CMPOC)

SBC and each CLEC will designate primary and secondary Change Management Points of Contact (CMPOC) for the regions in which it operates. The CMPOC will serve as the official designee for all matters regarding CMP, including submission of CLEC Change

Request forms (described in Appendix H) and notification of critical matters (e.g., OIS). This notification is in addition to the Accessible Letter notification process. The CLECs must provide the CMPOCs' names, telephone numbers, e-mail addresses and fax numbers to the SBC POR-CMPOC and the CLEC's Account Managers. SBC will create the CMPOC list and publish this list on SBC's regional CLEC web sites. It is SBC and the CLEC's responsibility to maintain and update the information on the list.

7.2 Change Management Process Meetings

7.2.1 Scheduled meetings will be held at intervals (at a minimum of once a quarter) agreed upon by SBC and CLECs to review the CMP and discuss development plans. During these meetings, the parties will review the effectiveness of the CMP and agree upon any changes. During the CMP meetings, SBC will share with the CLECs a non-binding, 12-Month Development View, with scheduled release dates. Prior to the close of the meeting, the location of the next meeting will be announced. To facilitate access to CMP documentation, SBC will maintain CMP information on its CLEC web site. At a minimum, SBC's CMP web page will contain:

- Current version of the SBC Competitive Local Exchange Carrier (CLEC) Interface Change Management Process document
- LSR-EDI Joint Release Test Plan Template
- A log of CLEC Change Requests and status as specified in Section 7.3 of this CMP
- References and/or Links to requirements for upcoming releases
- SBC's exceptions to the EDI LSOG Mechanization Specifications

7.2.2 SBC will maintain and distribute at the CMP meetings an Action Item Log containing action items from previous meetings and status. Additionally, during the CMP meetings, SBC will review status of the CLEC Change Requests. The meetings will include discussions of SBC's Development View, as well as any CLEC suggested development to the SBC OSS.

7.2.3 Minutes will be taken during the meetings by SBC. A draft version of the minutes will be distributed to meeting participants for comments or revisions. Revisions and comments will be incorporated into the final minutes. Comments or revisions not incorporated will be noted in the Accessible Letter distributing the Final Meeting Minutes[37].

7.3 Change Request Process
CMPOCs (see above) may recommend interface changes for future consideration by submitting a Change Request Form to the SBC's CMPOC and its Account Manager (as

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[37] Due to a regulatory requirement in Texas, the SWBT CMP meeting minutes will be filed with the TPUC within two weeks of the meeting.

described in Appendix H). The process and a sample form are included as Appendix H. SBC will maintain a log of these requests and provide status of each. SBC will publish this log on its regional CLEC web sites. In making a decision whether to include a CLEC Change Request in requirements, SBC will consider such factors as industry guidelines, feasibility, costs, user benefits and cost reduction.

7.3.1 Prioritization Process

This process has yet to be developed and is listed as an open issue. CLECs and SBC must agree collaboratively on how prioritization/categorization will be implemented.

7.4 Enforcement of POR CMP

A standing agenda item at the regular CMP meetings will provide an opportunity for SBC and CLECs to assess the effectiveness of the CMP and the need for any revisions.
Both CLECs and SBC will use this opportunity to provide feedback of instances of non-compliance and commit to taking the appropriate action(s).
If after using the discussion opportunity of the CMP meetings, there is consensus that the process is no longer working to the mutual benefit of all, the parties will schedule meetings to begin the re-engineering of the process. If there is no consensus, individual parties may approach the appropriate regulatory body.
Both CLECs and SBC will work to resolve any issue brought before the CMP. However, this process does not limit any party's rights to seek remedies before regulatory or legal arena.
If parties believe that non-compliance has been blatant and that the proposed solutions offered by the offending party(ies) is (are) unacceptable, both SBC and individual CLECs are free to pursue available legal remedies immediately without the need for further discussion at CMP meetings.

Appendix A

SYSTEM	SWBT	PB/NB	SNET	Ameritech	Proprietary /Retail	Interface Function & Type (See Legend)
GUI INTERFACE						
Order Status	X	X		X		Provisioning
Provisioning Order Status (POS)	X	X				Provisioning
EASE/BEASE	X				X	PreOrder/Order
Starwriter		X			X	PreOrder/Order
CCTools/W-CIWin			X		X	PreOrder/Order
CESAR On-Line		X			X	PreOrder/Order
CPSOS-Prequal (SWB)	X				X	PreOrder
TCNet Preorder				X		PreOrder
Verigate	X	X				PreOrder
3B			X		X	Order
LEX	X	X				Order
PBSM		X			X	Order
W-SNAP			X		X	Order
GATEWAY INTERFACES						
MSAP			X			PreOrder, Order, Maintenance and Repair
EDI-PreOrdering	X	X		X		PreOrder
CORBA	X	X				PreOrder
DataGate	X	X				PreOrder
CESAR (retiring)		X				Order
EXACT	X					Order
EDI Ordering	X	X		X		Order
E911 Gateway		X				Order
LIDB	X	X	X	X		Order
Listings Gateway		X				Order
DIRECT ACCESS						

SYSTEM	SWBT	PB/NB	SNET	Ameritech	Proprietary /Retail	Interface Function & Type (See Legend)
PREMIS (PACBELL)						
SORD	X	X				Order
MAINTENANCE AND REPAIR						
Trouble Administration	X			X		Maintenance and Repair
Trouble Ticket Status				X		Interactive Voice Response
OTHER						
BDS Telis (PC and Unix)	X			X		Order
OSS Interface Status - TCNet				X		
RMI		X			X	Order

Appendix H
SBC Change Management Process (CMP)
CLEC Change Request (CCR) Process

I. Overview

The purpose of this attachment is to overview SBCs process to receive CLEC Change Requests (CCR). This process identifies how SBC will receive and report the status of CCRs. CCRs are used to request changes to those OSSs, as well as LSOR business rules, included in the SBC/CLEC Change Management Process (CMP). These change requests fall into the following primary categories:

- New Functionality/Process
- Change to Existing Functionality/Process

SBCs OSSs fall into the following categories:

- Pre-Order
- Ordering
- Maintenance
- Billing
- LSOR/LSR Business Rules
- Other

CCRs are submitted by the CLEC CMPOC to SBCs CMPOC and Account Manager, and then reviewed to determine the appropriate system and SME. SBC will maintain a log of these requests and provide status of each. SBC will publish this log on its regional CLEC web sites. Status of CCRs will be updated on SBC's regional CLEC web sites. If approved, the requested change is targeted to a release. Notification of this change will be handled through the agreed upon Change Management Process. If not approved, notification will be sent to the CMPOC and updated on SBC's regional CLEC web sites.

II. Initiator

CCRs will only be submitted by CMPOCs of Qualified CLECs as defined below.

- either a CLEC with a signed Interconnection Agreement ("ICA"), with an implementation schedule for the interface, **or**

- one with a ROU/Memorandum of Understanding ("MOU") for the interface, **or**

- one who is negotiating terms and conditions for access to the interface, subject to acceptable substantiation and sanctioned by a majority vote of the other Qualified CLECs,

<div align="center">**and**</div>

- CLECs must be in production and be providing service to paying customers (i.e., customers other than employees and/or "friendlies") on the interface, **or**

- CLECs with a documented intent (as described above) to implement the interface within one (1) month of the scheduled release date, including providing service to paying customers (i.e., customers other than employees and/or "friendlies")

III. The Change Request (CR) Form

Each requested change is initiated by a CCR. See Attachment 1 for the CCR form and field descriptions.

IV. The CCR Process

1. The CLEC CMPOC submits a CCR form to SBC's CMPOC and its Account Manager.
   - Only the designated CLEC CMPOC can initiate a CCR.
   - If a CCR is received from someone other than the designated CMPOC, the CCR will be returned requesting that the CCR must be submitted by the CMPOC.

2. The SBC CMPOC notifies the designated CLEC CMPOC (via email or fax) of its receipt of the CCR.
   - This notice informs the CMPOC that the request has been received and the assigned tracking number.
   - This notice will be sent five business days from the receipt of the CCR.

3. **SBC CMP Internal Team reviews the CCR**
   - The SBC CMP Internal Team will review the CCR for validity.
   - If clarification is needed, the SBC CMP Internal Team will direct all questions to the designated CLEC CMPOC.
   - If the CCR is determined to be a valid request, a pending status will be assigned to the CCR and it is sent to the appropriate SBC Internal SME for evaluation.
   - SBC publishes the CCR on its regional CLEC web sites within 14 calendar days of receipt of the CCR.
   - If the CCR is determined not to be a valid request, a not approved status will be sent to the designated CLEC CMPOC through the SBC CMPOC.

4. The SBC Internal SME evaluates the CCR.
   - The SBC Internal SME will evaluate the CCR using the following considerations:
     - Industry guidelines
     - Technical feasibility
     - OSS direction
     - Financial feasibility

5. CCR evaluation results
   - If it is determined that the CCR can be implemented, the CCR is scheduled to a particular release.
   - If it is determined that it cannot be implemented, a "not approved" status will be sent to the designated CLEC CMPOC through the SBC CMPOC.
   - The standard interval to approve or deny the CCR is 30 days from the date of receipt of the CCR. If SBC determines that additional time for analysis is required, SBC will notify the CLEC CMPOC and advise of target date for decision. CLEC CMPOC may escalate the issue through the Account Team if necessary.

6. Notification of implementation of approved CCRs.

- If the CCR has been approved, SBC will provide a target implementation date and will follow the agreed upon CMP.

V. Reporting

The SBC CMP Internal Team is responsible for providing accurate and timely information to CLECs regarding CCRs. All CCRs will be shared with the CLEC community via SBC's regional web sites. The CLEC will be identified as the originator of the request, unless the CCR is marked Semi-Private/Proprietary.

The following information will be maintained for each CCR on the SBC's regional web sites:

- CCR Tracking Number
- Originating CLEC
- Applicable Interface
- Description of the change
- Status
- Decision date
- Date Received
- Committed response date

CLECs can provide comments on all CCRs through the Account Manager or SBC's CMPOC
Closed CCR's will be archived on the web

Attachment 1

CCR Form Definitions

1. CLEC (company name) initiating the change request.
2. Name of Account Manager assigned to the CLEC issuing the change request.
3. Click on (mark an "x"in) the appropriate box(es) in which the CLEC is operating.
4. Date the CCR is sent to the SBC Change Management Point of Contact (SBC CMPOC).
5. Click on (mark an "x"in) the appropriate box indicating if the CCR is being sent through email, fax, or other (e.g., paper, mail) medium.
6. Name of Primary CLEC Change Management Point of Contact (CLEC CMPOC) for the CLEC issuing the change request.
7. Telephone Number of the CLEC CMPOC.
8. Address and Room Location of the CLEC CMPOC.
9. Email Address of the CLEC CMPOC.
10. Fax number of the CLEC CMPOC.
11. Click on (mark an "x"in) the appropriate box indicating if the CLEC would like the CCR shared with other CLECs without identifying the originating CLEC, or including the identity of the originating CLEC. All CCRs are shared with other CLECs.
12. Click on (mark an "x"in) the appropriate box indicating if the requested change is a new functionality or process, change to the existing functionality or process, and/or if the requested change is being finalized at the Industry level. Please fill out the corresponding Issue number of the committee currently reviewing the Issue. If the change has been included in an LSOG Version # and EDI release #, please provide that information.
13. Click on (mark an "x"in) the appropriate box indicating if the CLEC is requesting the change with a high, medium, or low priority.
14. Click on (mark an "x"in) the appropriate box corresponding Pre-Order application for which this change is requested.
15. Click on (mark an "x"in) the appropriate box corresponding Ordering application for which this change is requested.
16. Click on (mark an "x"in) the appropriate box corresponding Repair & Maintenance application for which this change is requested.
17. Click on (mark an "x"in) the appropriate box corresponding Billing application for which this change is requested.
18. Click on (mark an "x"in) the box if the requested change affects LSOR/LSR Business Rules, and indicate the LSR form name, field name, and number to the corresponding LSOR/LSR Business Rule for which this change is requested.
19. Click on (mark an "x"in) the box if the requested change affects "Other" categories, and indicate the information for which this change is requested.
20. Include a detailed description of the requested change. Some items to include would be the function within the specific interface or process. Other items to include would be the LSR form name and field name and number within the specified form. If the priority has been deemed high, please provide the detail and reasoning to qualify this request as a high priority. Please note: this verbatim description will be included on the Change Request Log, which will be posted on the CLEC web site.

CMP - CLEC CHANGE REQUEST (CCR) FORM
OSS ELECTRONIC INTERFACE and ASSOCIATED BUSINESS RULES/PROCESSES

CLEC COMPANY/NAME:	CLEC OPERATING AREA	CCR SUBMITTED:
	☐ Ameritech	DATE:_____
SBC ACCOUNT MANAGER:	☐ Nevada Bell	☐ VIA EMAIL
	☐ Pacific Bell	☐ VIA FAX
	☐ SNET	☐ VIA TCNET
	☐ SWBT	☐ VIA OTHER

PRIMARY CLEC CHANGE MANAGEMENT POINT OF CONTACT (CMPOC) INFORMATION
(Contact for additional details/questions or to whom response will be made)

NAME:	TELEPHONE NO.:	ADDRESS/LOCATION:	EMAIL:	FAX:

PROPRIETARY STATUS
(CMPOC may indicate the degree to which CLEC wishes to share its CCR with other CLECs)

☐ SEMI-PRIVATE/PROPRIETARY – SHARE WITHOUT CLEC IDENTIFICATION

☐ NON-PROPRIETARY – SHARE NON-RESTRICTED

TYPE OF CHANGE:

☐ NEW FUNCTIONALITY/PROCESS

☐ CHANGE TO EXISTING FUNCTION/PROCESS

☐ INDUSTRY STATUS:

    ☐ Issue #_____OBF Initial Closure

    ☐ Issue #_____SOSC Review

    ☐ Issue #_____OBF Final Closure

    ☐ LSOG #_____EDI Release

PRIORITY REQUESTED:

☐ HIGH (Critical)

☐ MEDIUM

☐ LOW (As resources permit)

OSS FUNCTIONS CATEGORY & SPECIFIC INTERFACE/PROCESS IMPACTED (check appropriate box)

PRE-ORDER	ORDERING		REPAIR & MAINTENANCE	BILLING	LSOR/ LSR BUSINESS RULES	OTHER
☐ EDI	☐ CEASE	☐ E911	☐ Trouble Admin.	☐ Bill Info	☐	☐
☐ Verigate	☐ BEASE	☐ Listings	☐ PBSM	EDI billing (811)		
☐ DataGate	☐ LEX	☐ Starwriter	☐ CCTools	Daily Usage Extract file		
☐ CORBA	☐ EDI	☐ Order Status	☐ MSAP	EMI records?		
☐ CCTools	☐ PBSM	☐ W-SNAP				
☐ MSAP	☐ POS	☐ MSAP				
☐ TCNet	☐ SORD	☐ 3B				

DETAILED DESCRIPTION OF REQUESTED CHANGE (Verbatim Description will be added to the Change Request Log on the web site)
(If Priority = High, provide detail sufficient to qualify CCR as critical)

EMAIL TO: POR CMPOC SEND CC: TO Ameritech, NB, PB, SNET, or SWBT ACCOUNT MANAGER

CMP - CLEC CHANGE REQUEST (CCR) FORM
OSS ELECTRONIC INTERFACE and ASSOCIATED BUSINESS RULES/PROCESSES

SBC USE ONLY:

INITIAL PROCESSING		CCR TRACKING NUMBER	REQUEST STATUS	COMMENTS
Date Received:	Date Acknowledged:		☐ PENDING (Under review) ☐ APPROVED ☐ DEFERRED ☐ NOT APPROVED	

EMAIL TO: POR CMPOC SEND CC: TO Ameritech, NB, PB, SNET, or SWBT ACCOUNT MANAGER

Attachment 2

CCR Tracking Number	Originating CLEC	CLEC Primary Contact Name	Interface Affecting	Description

Appendix J

Walk-through Guidelines

Per the 13 State Change Management Process an Initial Walk-through will take place to review the requirements of a new or change to a GUI or EDI application. See sections, 3.3.8.1, 3.5.2,4.2.10.1, and 4.3.4 for definition of Initial Release Requirements timelines.

The following walk-through process will be utilized to provide successful discussion of the requirements definitions.

1. Invite appropriate attendees. The audience of the walk-through should consist of the necessary SMEs who have authority and can make decision regarding the requirements definition of the planned changes. The SME list should consist of a cross section of Business and IT specialists whom have knowledge of the application's purpose and utilization in the OSS.

2. The invitation should specify the affected interfaces and the region(s) within the 13 States. Additionally the invitation should break down the timeline of the meeting to specify the time slot for each affected interface and region to be discussed. This will allow the prospective attendees to isolate the time requirements and resources necessary for the walk-through.

3. The walk-through should not take place unless there is a balanced representation amongst both the CLEC and SBC / Ameritech community. (need to define "balanced")

4. The SME's and CLEC audience shall submit questions, concerns, and issues to their CMPOC prior to the walk-through. The intent is for SBC to have review time prior to the walk-through. This should accelerate the walk-through process by allowing SBC to retrieve answers or arrange appropriate SME representative's availability for the walk-through.

5. An Issue / Resolution template should be created as part of the CMP in order that SBC and CLECs have a standard format for submitting questions / issues.

6. SBC should make all CLEC questions / issues available to the walk-through audience at the time the conference call or face to face meeting time is set. Numbering the issues is appropriate for purposes of discussion during the walk-through. It is recommended that the CLEC issues become part of the requirements document as the "Open Issues" Appendix. As the walk-through proceeds, the resolutions are documented and become part of the "living" Requirements document.

7. There should be an assigned note taker for each walk-through. They shall document the meeting as well as note the applicable status to documented issues as well as capture new issues that may arise during the walk-through.

8. On the day of the walk-through, the CLECs and SBC should agree on the appropriate format of the walk-through based on the documented questions / issues and the change complexity. Once the format of the walk-through is chosen the walk-through shall proceed.

   - Possible Format Choices:
     A) Review Requirements document word for word by reading aloud to the walk-through audience. Address pre-documented issues as they apply during the reading. If new issues are identified they should be documented if a resolution cannot be reached and the walk-through shall continue.

     B) Review Requirements document a section at a time (outline format) and address pre-documented issues as they apply to each outlined section. Any new issues that arise during the walk-through shall be documented if a resolution is not reached during the walk-through. If a resolution is reached, the requirements document should be updated accordingly.

     C) Review the pre-documented issues and any new walk in issues only. Document resolutions when possible and status each issue appropriately.

9. Upon completion of the document walk-through, confirm a CLEC and SME understanding of any open issues.

10. Schedule a follow-up meeting(s) if appropriate; to work open issues to resolution prior to the Final Requirements distribution.

11. Publish the walk-through outcome in the form of minutes of the walk-through as well as an updated issue list and the expectation of issue resolution timeframes.

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Attachment B

TABLE 2

Month	Mechanized Line Losses Sent Within 1 Day of Work Completion	Total Mechanized Line Losses	Percent Met	Original MI 13 Aggregate Result
Nov 2002	96,473	106,277	90.78%	~~96.82%~~ 96.43%
Dec 2002	97,821	102,060	95.85%	~~97.10%~~ 97.61%
Jan 2003	123,040	126,280	97.43%	~~92.79%~~ 92.19%